

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	1:21-CR-10059-DJC
	)	
	)	
PATRICK PLUMMER	)	

**DEFENDANT'S MEMORANDUM IN AID OF SENTENCING**

**EXHIBIT A**

**LETTERS OF SUPPORT FOR PATRICK PLUMMER**

December 10th, 2022

Honorable Denise Casper  
US District Court

Your Honor,

My name is Michelle Kennedy. I am Patrick Plummer's Mom. I live in Hiram, Maine.

I understand and acknowledge Patrick has committed a serious crime and that there will be serious consequences. I was both troubled and shocked to know about Patrick's charges and as his mom it is profoundly difficult to understand. He has always been obedient, honest and has never caused any trouble his entire life.

I will start this letter with an accurate depiction of Patrick and what I know of Patrick's true character. Patrick was born, 31 years ago today, in the small community of Skowhegan, Maine. Patrick was an easy child, always smiling and eager to learn new things and he always enjoyed the presence of his family. Patrick enjoyed reading books, puzzles, art and was always curious about how things worked. His interest in tools started at a young age and through the years tools became an essential part of Patrick's life.

Patrick entered kindergarten with the desire to discover many opportunities for growth. Patrick signed up for T-ball. Patrick continued his desire and love of the sport for many years, being a star pitcher and receiving over a dozen trophies. He also joined the Cub Scouts, continuing all the way through to becoming an Eagle Scout.

Patrick always had an interest in musical instruments. He purchased an electric guitar, taking private lessons and performing in his middle school band. He entered a talent show contest at the University of Southern Maine. Patrick played the National Anthem, winning first place. Patrick was a CIT (counselor in training) at the University of Southern Maine Child and Family Center Summer Camp. Patrick volunteered his services, planned activities and supervised campers.

Patrick's work ethic has always been outstanding. He currently works at the jail Monday through Friday not missing a day. At the age of 14, Patrick wanted to purchase a dirt bike and he knew he had to earn the money. Patrick took the initiative and worked at his family firewood business, cutting and splitting 4 cords of wood. While attending high school and Vocational school Patrick worked part time at Target as a sales associate. He graduated Vocation school, studying Automotive and landed his first automotive job at VIP auto center. He then started a job at Prompto where he became a technician and quickly was promoted to Manager of his own store. Patrick never missed work.

Patrick is a dedicated family man. Growing up he had two younger brothers who he involved in everything. He would ride bikes with them, go fishing, and snowmobiling, just to name a few. Patrick is also very close to his maternal grandparents and his two uncles. He has spent a lot of time with them and has a special bond with all.

Later in life Patrick started his own family and became a dad at the age of 23. He has 3 beautiful children. Patrick is a dedicated father and took care of his children with pride. Patrick bought a beautiful home in 2019 to house his family and provided a safe environment for them to live. Patrick was involved in their schooling, out of school activities and brought them faithfully to church every Sunday. Patrick was the sole provider of his children. With the sporadic absence of his wife, Patrick would prevail, conquer and sustain the household, having his children as his top priority.

Patrick had a small circle of friends. He had one best friend with whom he would go fishing, snowmobiling and attend local car shows.. Patrick is a gentle and kind soul. Many can attest to this. One example is when our next door neighbor was injured. Patrick would help her on the bus, carry her back pack and bring her to all her classes. He did this for several weeks. Another time I recall there was a bad accident across the street from our home. The driver had a medical episode and hit a tree. Patrick was the first on the scene and assisted with these victims until EMT arrived. These are just a few of many examples.

Patrick has overcome many obstacles in life. From an early age Patrick's biological father abandoned him, was absent from his life and chose addiction over being a father. Patrick never understood this and it bothers him to this day. Patrick had a step dad, my ex husband who abused Patrick both mentally and physically and Patrick was always blamed for brothers' wrongdoings. Patrick, thus became quiet and secluded and did not share incidents that took place when I was not home. He was worried about the repercussions I would receive. Patrick suppressed the angst of emotions from his childhood through a cannabis derived product that is highly addictive and could affect judgment. Through intestinal fortitude and by the grace of God, Patrick broke free of this addiction independently.

Patrick through high school had a girlfriend who he later wed in 2017. Patrick's wife, now ex-wife, chose infidelity, sometimes never coming home. She would leave the children unattended while he was at work and he would come home to his neglected children. This bothered Patrick tremendously and he did everything he could to rectify this situation. Patrick has had many factors that have hindered his life.

I, as his mother, communicate on a daily basis with Patrick. Patrick has expressed to me his remorse and shame with what he chose. He has stated he will serve his time and take full responsibilities of his actions. I feel, and Patrick has shared this with me, his road to rehabilitation has started from day one of being incarcerated. He has made changes in his holding facility while awaiting sentencing. Patrick attended counseling once a week, meets with the facility's Deacon once a week, works at the facility and just recently started classes to receive his High-set Diploma.

Patrick's incarceration has been difficult on him and the family. He has missed family gatherings, holidays, birthdays and recently the death of his 51 year old uncle, my brother. Even though Patrick was able to video call his uncle in his last moments , this has taken a toll on Patrick. He was not home with the family to support them through this difficult time. Patrick has thus far shown a steadfast and resolute demeanor in moving forward past his mistake of a serious crime.

It is in my prayers this letter regarding Patrick will act as a positive depiction of who Patrick really is as a person.

Thank you sincerely for allowing me to share this all with you.

Sincerely,

Michelle Kennedy

12 December, 2022

Hon. Denise Casper  
U.S District Court  
Boston, Mass

Your Honor,  
I am Harry Libby and reside in No. Waterford, Maine. I am PATRICK PLUMMER'S grandfather.

I am aware of the crime my grandson committed and was more than overwhelmed and shocked to learn of it.

I was present when PATRICK was born in Skowhegan, Maine. He was my first grandson. His father, Clifford was only present for a year or so before his parents decided to break up. He then moved in with my family. Growing up he was very active in the outdoors. His mother MICHELLE later married a man she had previously known. PATRICK seemed to thrive as a young boy and was very outgoing. Apparently things did not go well with this relationship with his stepfather.

PATRICK was involved in scouting with my son and myself. We climbed MT. Katahdin, crossed rivers to camp on an island. He was happy. He was mechanically inclined and loved working with his hands. PATRICK graduated from Automotive Tech. School. He was very proud of this. He also excelled in baseball on his team in school.

After his parent's divorce, PATRICK seemed to lose his interest in things. But he always cared about his extended family. He worked at different jobs in order to find a permanent employment. He married and had a son ETHAN who he adored. He had a steady job as a mechanic. He and his wife had two more children. Things were about to change. He was not happy with his marriage as his wife started to "run around" on him. In fact she damaged the whole family. I feel this lead to PATRICK's downfall.

I know that he realized his mistake of his actions and now expresses remorse in his actions. We talk occasionally and I can hear in his voice that this event was a very large mistake.

He is very embarrassed about his incarceration. I truly believe that PATRICK can be re-habilitated with the right help. He was my first grandchild and I am not giving up on him. He loves his three children and poses no threat to them.

A recent court case with his ex wife and my family has shed a great deal of light on PATRICK's plight.

SINCERELY:

HARRY LIBBY & wife MARY JEANNE

*Harry Libby & Mary J.*

December 10th, 2022

Honorable Denise Casper  
United States District Court

Your Honor,

My name is Paul E. Kennedy and I am Patrick Plummer's stepfather. I reside at 58 Durgintown Road, Hiram Maine.

It is with a heavy heart I am speaking on Patrick's behalf. I was quite shocked to hear of the life choices he has made. I first met Patrick 10 years ago. I saw true potential, but somehow his spirit seemed broken. I worked with Patrick and saw his natural talents, such as following through, being steadfast, and facing problems head on. Patrick applied himself with vigilance when on the job. He worked long hours providing for his family. This provided a safe roof over his children's head. He was very attentive to the wellness of his children/family. He made sure they were fed, clean and in a clean environment.

Over the 10 years Patrick made a lot of accomplishments. I worked one on one with Patrick to understand the importance of banking. He wanted to purchase a particular type of motorcycle. We did an internal banking audit and found credit anomalies. I set up an appointment and walked Patrick through the process. He worked diligently to pay off these items, and this chapter was history. At that moment he established himself and understood accountability and being on time. Over the 10 years he built up his credit to later on buy his dream car and pay it in full. One year later, he was able to buy his beautiful home for his family.

Because I have seen Patrick work so hard I am grief stricken at the charges that he is facing.

Sincerely,  
Paul E. Kennedy

December 11th, 2022

Honorable Denise Casper  
US District Court

Your Honor,

My name is Scott Alan Libby of Raymond ,Maine. I am Patrick Plummer's uncle, his mother's eldest brother.

When I learned of Patrick's crime I was blindsided to say the least. It came as a total shock because Patrick has always been such a benign soul and a good natured young man. My parents (Patrick's grandparents) and I drove nearly 100 miles in a snowstorm to be there when he was born. From that very day forward I have nothing but cherished memories with him. Memories such as mastering T-ball so fast that his coach had to actually pitch to him and set aside the T. From there I witnessed Patrick develop into one of the best baseball players his school had ever seen. His coach told his mom that he had the potential and talent to become a pro baseball player when he grew up.

Patrick also became close friends with his high school shop teacher. They often gathered with other mutual friends and went snowmobiling up north on trips. Patrick's shop teacher saw an inclination and natural understanding in Patrick for shop classes, specifically engines and metal. Patrick soon after graduated from the Westbrook High School Automotive and Industrial Arts program.

When Patrick and his two younger brothers Matthew and Nathan attended The University of Southern Maine summer camp, where their mom worked, Patrick was a CIT and entered a talent contest and won first place playing his electric guitar. As soon as Patrick turned 8 yrs old, he would stay with me at my home in Raymond for a few days at a time. We enjoyed riding bikes, hiking, swimming in the nearby Panther Pond, and he often drove around his battery operated Chevy truck up and down my driveway. He would enjoy how I transported his mini truck "in the back of uncle's truck". He was always a hit at family gatherings during the holidays. My sister Michelle would dress him so festive and his curly hair was always the focal point. Patrick has always been loved and adored by family and friends and even admired by total strangers who had the privilege of meeting him. He was imparted the admiration of all his teachers and employers.

I share the common distinction with Patrick of being the eldest of his two younger siblings, and sharing December birthdays. Our relationship has kindred that way and I love him dearly and miss him with all my heart. I was so honored to become an uncle and I could not have asked for more of a blessing than Patrick.

I believe that Patrick's strong bond with family, teachers and friends have contributed to his strong resolve and his resilience for overcoming any strife and misfortune in his life. I believe that his endurance and his conduct the last two years being incarcerated is direct evidence of that. The last two years has given Patrick the opportunity to reflect on his crime and his bible studies there have certainly taught him of its severity as well as guide him to a more rightful future.

In closing, thank you, your Honor, for reading my thoughts and input towards Patrick's situation and for considering them.

Yours sincerely,

Scott A. Libby



December 12, 2022

Hon. Denise J. Casper  
United States District Court.

Your Honor,

My name is Chris Jordan and I am a family friend and long time friend of Paul Kennedy, Patrick Plummer's stepfather.

I was quite surprised and upset when I heard what Pat had done. I had a school friend that I stopped associating with after high school because of the way he treated me and other people. Years later he was convicted of the same thing as Pat. This did not surprise me at all, but Pat, on the other hand, did. He always came across as a person I could trust. Having a background in auto repair and a well-equipped home auto shop I would help him with his car. I trusted him and never worried about tools being missing or misused. He was always polite and appreciated my help. I was happy to help him save money to help his family. My children are the same age as him and I know what it is like trying to make ends meet with a young family. Pat was making a good effort to do just that.

I have had no direct contact with Pat since he was arrested. He did send a message through Paul Kennedy about his situation and how he was trying to cope with it. I hope he will get, and accept, the help he needs.

Christopher Jordan  
[359 Ocean House Rd](#)  
Cape Elizabeth, ME 04107

Superintendent  
Christopher Brackett

Security Captain  
Robert Hayden

Administration Captain  
Gwen Weisgarber

**STRAFFORD COUNTY  
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December 3, 2022

To Whom It May Concern:

I have known Patrick Plummer as an inmate through the Strafford County Department of Corrections (SCDOC) for over a year. He has received spiritual counseling and attended Bible Study as well as Prayer Services until COVID took its toll on programming. There was also a three-month space of time when I was ill, preventing him from spiritual counseling. We started up again in September of this year. He has also received counseling from one of our social workers.

Mr. Plummer has, in this past year, worked with sincerity on his personal situation and his responsibility through a variety of spiritual tools, including prayer. He has sought guidance and support from the Scriptures. My personal observation is that he has been strengthened by his faith, from being unsure of God's presence to a peaceful security that God still watches over him even in this troublesome and, sometimes, dark time of his life. He truly relies on an inner strength to steer him away from possible temptation and to keep him firmly in the grace of God's goodness.

But I am most impressed with his sense of family. His goals are not only in "recovery" but in making sure his children are safe and unharmed. He has stated a determination to refuse the use of the Internet to the point of giving up the usage of computers altogether. I am encouraging him to surround himself with those whom he considers supportive, compassionate, understanding, and loving.

As subjective as this may appear, Mr. Plummer continues to redefine himself. He clearly faces new challenges for the future but, I believe, his trust in God and the support of his family have been a major factor in his personal life choices and commitment to family. He knows the spiritual and relational tools he needs for his future and I pray for his success.

My hope is that anyone involved in his case will take this into consideration as he continues to find renewed direction for his life.

Respectfully submitted,

Deacon Arnold Gustafson

SCDOC Chaplain